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Hearing Date: October 28, 2015
Time: 10:00 a.m.

Objection Deadline: October 12,
2015

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

CITIVIC NOMINEES LTD.,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01513 (SMB)

**NOTICE OF MOTION AND MOTION FOR ENTRY OF ORDER
PURSUANT TO RULE 15 OF THE FEDERAL RULES OF CIVIL
PROCEDURE AS INCORPORATED BY RULE 7015 OF THE FEDERAL RULES
OF BANKRUPTCY PROCEDURE GRANTING MOTION FOR LEAVE TO FILE AN
AMENDED COMPLAINT ADDING EUROCLEAR BANK S.A./N.V. AS A DEFENDANT**

PLEASE TAKE NOTICE that Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities, LLC (“BLMIS”) and the estate of Bernard L. Madoff (“Madoff”), by and through his undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on **October 28, 2015 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, seeking entry of an order pursuant to Rule 15 of the Federal Rules of Civil Procedure, as incorporated in this proceeding by Rule 7015 of the Federal Rules of Bankruptcy Procedure, granting the Trustee’s request for leave to file an Amended Complaint Adding Euroclear S.A./N.V. as a Defendant, in substantially the form annexed hereto as Exhibit A, as more particularly set forth in the accompanying Memorandum In Support Of Motion For Leave To File An Amended Complaint to this Motion.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, conform to applicable rules of this Court and be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, in accordance with General Order 242 by no later than **5:00 p.m. on October 12, 2015** (the “Objection Deadline”) (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Thomas L. Long; and (b) Securities Investor Protection Corporation, 1667 K Street, N.W., Suite 1000, Washington, D.C. 20006-1620, Attn: Kevin H. Bell, so as to be received no later than the Objection Deadline. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

PLEASE TAKE FURTHER NOTICE that replies to objections, if any, must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **5:00 p.m. on October 19, 2015** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein).

PLEASE TAKE FURTHER NOTICE that notice of this motion will be provided by U.S. Mail or email to all defendants in this adversary proceeding pursuant to the Order Establishing Notice Procedures (Adv. Pro. No. 08-01789 (SMB); ECF No. 4560), as well as to counsel for Euroclear Bank S.A./N.V. The Trustee submits that no other or further notice is required.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Dated: September 25, 2015
New York, New York

/s/ Thomas L. Long
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